

SHER TREMONTE LLP

MEMO ENDORSED

May 12, 2020

VIA ECF

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
Hon. Charles L. Brieant, Jr. United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Goldbrener, et al.*
Case No. 18 Cr. 614 (KMK)

Dear Judge Karas:

We represent Susan Klein, a defendant in the above-referenced matter. We write on behalf of our client to request a 60-day adjournment of sentencing, which is currently scheduled for June 17, 2020. This is our first request for an adjournment of sentencing.

As Your Honor is aware, we were recently retained as substitute counsel for Ms. Klein. We have been working diligently to get up to speed on the facts of the case and Ms. Klein's personal history and circumstances; however, additional time is needed to develop a full record to present to the Court for sentencing. The constraints of the COVID-19 crisis have, of course, created additional delays, as they have for everyone. Accordingly, we respectfully request that the Court adjourn sentencing until a date the week of August 10, 2020 that is convenient for the Court (counsel has one conflict the morning of August 13, but is otherwise available that week). We respectfully request a concomitant adjournment of the deadline for disclosure of the Presentence Report.

We have spoken with the government about the proposed adjournment and the government consents to our request. We appreciate the Court's consideration.

Respectfully submitted,

/s/ _____
Justine A. Harris
Noam Biale

Attorneys for Susan Klein

*Granted. The sentence
is adjourned to 9/10/20
at 2:30 p.m.*

SO ORDERED


KENNETH M. KARAS U.S.D.J.

cc: All counsel (via ECF)